

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**

**DOCKET NO. 2020-264-E**  
**DOCKET NO. 2020-265-E**

<b>IN RE:</b> Duke Energy Carolinas, LLC's and ) Duke Energy Progress, LLC's ) Establishment of a Solar Choice ) Metering Tariff Pursuant to S.C. ) Code Ann. Section 58-40-20 (See ) Docket Nos. 2019-169-E, and ) 2019-170-E) )	<b>PETITION FOR REHEARING AND/OR          RECONSIDERATION</b>
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Pursuant to S.C. Code § 58-27-2150 and S.C. Code Ann. Regs. 103-825, 103-854, and applicable South Carolina law, the South Carolina Office of Regulatory Staff (“ORS”) hereby respectfully petitions the Public Service Commission of South Carolina (“Commission”) for a limited rehearing and/or reconsideration of its findings and conclusions in Order No. 2021-390 (the “Order”), and, alternatively, to provide clarification for certain findings or lack thereof. Specifically, ORS respectfully requests the Commission hold a limited rehearing and/or reconsider its position regarding ORS’s recommendation that Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (“Duke” or “Companies”) be required to track and file annual reports on the cost shift based on the avoided cost for solar customer-generators subscribing to the Interim Riders and the Solar Choice Metering Tariffs.<sup>1</sup> The Commission did not explicitly rule on ORS’s recommendation in Order No. 2021-390.

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<sup>1</sup> Lawyer Surrebuttal p. 6, ll. 16-18.

With Act 62, the General Assembly stressed the importance of eliminating the cost shift or subsidization associated with net energy metering (“NEM”), to the greatest extent practicable. S.C. Code Ann. § 58-40-20 (A)(3) and (G)(1) (Supp. 2019). Annual reporting on the cost shift will provide this Commission and ORS the opportunity to monitor the financial impact of the recently approved tariffs and associated incentives offered to new solar customer-generators and the reports can be used to help inform future updates to the Solar Choice Metering Tariffs.<sup>2</sup> Unlike the cost recovery mechanisms approved under Act 236 for the previous NEM programs, the cost recovery mechanisms contained in Act 62 and approved by the Commission may not allow for the costs associated with solar customer-generators to be readily quantifiable. Under the previous NEM tariffs, there is full transparency as to the cost shift imposed on non-customer generators due to the imposition of a separate charge for distributed energy resource programs.

In order to comply with Act 62’s requirements to eliminate any cost shift or subsidization to the greatest extent practicable, this Commission must be fully informed on the actual cost shift imposed on all customers, which can be easily achieved by requiring the Companies to track the cost shift and report the impacts to this Commission annually. The tracking and reporting can be accomplished in the same manner as the Companies currently perform for the previous NEM tariffs. However, the calculations would incorporate the value of solar as determined in Docket No. 2019-182-E. Additionally, ORS’s recommendation was unopposed, with no party objecting to or addressing ORS’s recommendation for annual reporting.

### **Conclusion**

For the reasons stated herein, ORS respectfully requests the Commission hold a limited rehearing on and/or reconsider ORS’s recommendation for a requirement that the Companies track

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<sup>2</sup> Lawyer Surrebuttal p. 6, ll. 21-23.

and file reports on the cost shift based on the avoided cost for solar customer-generators subscribing to the Interim Riders and the Solar Choice Metering Tariffs and provide this tracking and reporting on an annual basis in Docket Nos. 2020-264-E and 2020-265-E.

Dated this 9<sup>th</sup> day of June 2021.

\_\_\_\_/s/ Jenny Pittman

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